

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Cherryl Auguste

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

COMPLAINT

The City of New York Mayor Eric Leroy Addams,
~~The Department of homeless services, HRA human resources~~
~~administration, The administration for children services (ACS),~~
~~Jess Dannhouser, One Brooklyn Health, Brookdale Hospital Medical~~
~~Center, ROC nation, Shawn Corey Carter, LESFU lower east side family~~
~~union, WIN women in need inc., Dwayne Messam, Christine c. Quinn,~~
~~Midway Living, Priscilla Moore, Deborah perkins, Trudy ann Blackburn,~~
~~Mariama Diallo, Dominique davila, NYLAG,~~
~~Nicholas Scooppetta children's center~~

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

violation of the federal anti-organized crime section 962, 15 U.S code 1692d, Title 18 U.S code 2261a

42 usc 1983: Civil action for deprivation of rights fourteenth amendment violation right to equal protection deprivation of rights

violation of due process, right to privacy, hipaa violations, violation of disability rights disability harassment 504 title 2/mental health

violation of the civil rights act of 1965 discrimination base on my race ,color,sex, i am a black african american woman

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff , _____ , is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

CHERRYL		AUGUSTE
First Name	Middle Initial	Last Name
130 E 39th st apt 1603		
Street Address		
new york	ny	10016
County, City	State	Zip Code
6464840857	unbrokenfoundation.inc@gmail.com	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<div style="display: flex; justify-content: space-between;"> eric adams </div>
	<div style="display: flex; justify-content: space-between;"> First Name Last Name </div>
	Mayor of New York City
	Current Job Title (or other identifying information)
	city hall
	Current Work Address (or other address where defendant may be served)
	<div style="display: flex; justify-content: space-between;"> new york ny 10007 </div>
	<div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>
Defendant 2:	<div style="display: flex; justify-content: space-between;"> department of homeless services </div>
	<div style="display: flex; justify-content: space-between;"> First Name Last Name </div>
	prevention/shelter programs
	Current Job Title (or other identifying information)
	33 Beaver st
	Current Work Address (or other address where defendant may be served)
	<div style="display: flex; justify-content: space-between;"> new york ny 10004 </div>
	<div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>
Defendant 3:	<div style="display: flex; justify-content: space-between;"> HRA The human resources administration </div>
	<div style="display: flex; justify-content: space-between;"> First Name Last Name </div>
	goverment assistance agency
	Current Job Title (or other identifying information)
	109 E 16th street
	Current Work Address (or other address where defendant may be served)
	<div style="display: flex; justify-content: space-between;"> new york ny 10003 </div>
	<div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>

Defendant 4: Jess Dannhouser

First Name Last Name

commissioner of the administration for children services

Current Job Title (or other identifying information)

209 madison ave

Current Work Address (or other address where defendant may be served)

new york,new york ny 10016

County, City State Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: New York City, New York, Brooklyn

Date(s) of occurrence: 04/06/2024-still occuring as of today 01/11/2025

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

our family came to new york due to homelessness on 04/06/2024 we enter path which placed us at WIN shelter 25 junius st in brooklyn. WIN shelter, Dwayne messam, ceo Christine Quinn, Deborah perkins, violated my rights under civil rights act discrimination, my fourteenth amendment right to be treated equally, WIN shelter was used as an organization to prey on me and harm me. they use fear and threats of acs to keep our family from leaving their shelter after months of asking for transfers to escape their abuses Dwayne messam refuses too transfer us deborah perkins would degrade and yell loudly at me to degrade me and put me and my children down. while at their shelter we would be forced to talk to mental health services they told us these services were voluntary however they would violate our privacy by follow us around the community in brooklyn when we walked to dollar stores all to scare us the mental health and hygiene workers and some of the WIN shelter secuirty repeatedly abused me and my children while being new to new york. we were vulnerable and Dwayne messam orchastrated repeated abuses in the shelter he runs. i was subjected to being pinned down and handcuffed for simply crying in my room repeatedly infront of my children. the win shelter staff would repeatedly subject me to this for no reason i was all alone in new york in brooklyn i never been to new york this was beyond scary for us. the staff at win shelter kept repeatedly calling ems and police for no reason. after a month i started to apply to find a place to escape their abuses ms deborah perkins was my caseworker i told her i was paying for a bus ticket to move out of their shelters due to abuses as retaliation that same night i told her we could not put up with what they were subjecting us too she weaponized acs as fear she made false reports to acs to keep us from leaving new york the same night i told her we did not want to keep experiencing abuses at win shelter.

~~I strongly believe the defendants are all apart of a huge major crime ring targetting me and my children in new york city preying on our vulnerabilty and thats not okay. they weaponize government agaencies to harm the vulnerable in new york to make our lives unliveable. these indiviuals have more resources than me and my children they know we are all alone and dont have anyone to stand up for us so they repeatedly harms us and when we speak up they abuse us more they violate our rights more i strongly believe our 5 month delay to access basic food benefits to feed my children and basic cash assistance delays were to keep us in poverty and being abuse further with no resources in their shelter system. while also subjecting me to being illegally handcuffed pinned down and retraumatized multiple times all to keep a roof over my childrens heads. they violated my constituinal rights these indiviauls i believe are apart of a bgger crime ring while i was experiencing this i was sharing stories from my platform page called unbroken healing i would share things about celebrity gossip mostly about shawn carter~~

~~continued please see attached*~~

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Deep psychological injuries- Dwayne messam and the WIN shelter staff subjected me to repated abuses forcing me to be handcuffed, pinned down by multiple officers while i did not commit any crimes except for crying in my room in their shelters due to their abuses in new york it is not a crime to cry. i was treated like an animal for crying it was intentionally done to cause me mental harm. and now i have serious ptsd, anxiety, because i was a vulnerable black mother with kids in their shelter system i was not allowed to cry. WIN shelter failed to treat me equally, they lied on official reports to harm me with false acs cases, they subject my children to being illegally removed due to their lies and repeated abuses all while refusing to transfer us from their abuses*attached

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

i am seeking 10,000,000.00 Non-Economic losses due to deprivation of my constitutional rights, loss of enjoyment of life. mental anguish, i am seeking punitive damaages in the total of 50,000,000.00 their actions were intentional. it was intentionally done to harm me and my children and cause pain in our lives while new to new york living in the shelter system and ruin my reputation i am also asking the court to award damages to me to deter the defendants from particapting in harming anyone else who are new to new york and vulnerable especially in their shelter systems. and to deter acs from harming minority mothers with their services. also for Roc nation to not misuse government agencies to weaponized and harm low income mothers because they have access to millions we dont

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

01/11/2025

Dated

cherryl

Plaintiff's Signature

auguste

First Name

Middle Initial

Last Name

130 E 39th st apt 1603

Street Address

new york,new york

new york

10016

County, City

State

Zip Code

6464840857

unbrokenfoundation.inc@gmail.com

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court
Southern District of New York**

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one “free look” at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first “free look” or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the “free look” to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court’s Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your “free look” and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court’s actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk’s Office at the Court.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Name (Last, First, MI)

	ny	10016	
Address	City	State	Zip Code

6464840857

Telephone Number

E-mail Address

Date

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007